

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>JOHNNY M. HUNT,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 3:23-cv-00243</b>
	)	
<b>SOUTHERN BAPTIST CONVENTION;</b>	)	<b>Judge Campbell</b>
<b>GUIDEPOST SOLUTIONS LLC; and</b>	)	<b>Magistrate Judge Frensey</b>
<b>EXECUTIVE COMMITTEE OF THE</b>	)	<b>Jury Demand</b>
<b>SOUTHERN BAPTIST CONVENTION,</b>	)	
	)	
<b>Defendants.</b>	)	

---

**MOTION FOR LEAVE TO FILE UNDER SEAL**

---

Pursuant to Rules 5.03 and 7.01 of the Local Rules and the Court's Protective Order allowing Jane Doe to proceed under a pseudonym (Doc. No. 192), Plaintiff Johnny M. Hunt respectfully submits this Motion for Leave to File Under Seal an unredacted version of Exhibit 1 submitted in connection with Plaintiff's Supplemental Brief Addressing Plaintiff's Declaration.

Exhibit 1 contains Jane Doe's name, which has resulted in the public filing in redacted form pursuant to Local Rule 5.03(c).

For the foregoing reasons, this Court should review the unredacted version of Exhibit 1.

[SIGNATURE BLOCKS AND CERTIFICATE OF SERVICE TO FOLLOW]

Dated: May 30, 2025

Respectfully submitted,

*s/ Robert D. MacGill*

---

**Robert D. MacGill, Esq. (*pro hac vice*)**

**Patrick J. Sanders, Esq. (*pro hac vice*)**

MACGILL PC

156 E. Market St.

Suite 1200

Indianapolis, IN 46204

Telephone: (317) 721-1253

robert.macgill@macgilllaw.com

patrick.sanders@macgilllaw.com

*-and-*

**Todd G. Cole, Esq., BPR # 031078**

**Andrew Goldstein, Esq., BPR # 037042**

COLE LAW GROUP, P.C.

1648 Westgate Circle, Suite 301

Brentwood, TN 37027

Telephone: (615) 490-6020

Fax: (615) 942-5914

tcole@colelawgrouppe.com

agoldstein@colelawgrouppe.com

*Attorneys for Plaintiff*

## **CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing Motion for Leave to File Under Seal to be electronically filed with the Clerk of the Court on May 30, 2025, using the CM/ECF system, which will automatically serve all counsel of record listed below:

Todd G. Cole, Esq.  
Andrew Goldstein, Esq.  
COLE LAW GROUP, P.C.  
1648 Westgate Circle, Suite 301  
Brentwood, TN 37027  
Telephone: (615) 326-9059  
[tcole@colelawgrouppc.com](mailto:tcole@colelawgrouppc.com)  
[agoldstein@colelawgrouppc.com](mailto:agoldstein@colelawgrouppc.com)

Robert D. MacGill, Esq.  
Patrick J. Sanders, Esq.  
MACGILL PC  
156 E. Market St.  
Suite 1200  
Indianapolis, IN 46204  
Telephone: (317) 721-1253  
[robert.macgill@macgilllaw.com](mailto:robert.macgill@macgilllaw.com)  
[patrick.sanders@macgilllaw.com](mailto:patrick.sanders@macgilllaw.com)

### *Counsel for Plaintiff*

John R. Jacobson, Esq.  
Katharine R. Klein, Esq.  
RILEY & JACOBSON, PLC  
1906 West End Avenue  
Nashville, TN 37203  
(615) 320-3700  
(615) 320-3737 Facsimile  
[jjacobson@rjfirm.com](mailto:jjacobson@rjfirm.com)  
[kklein@rjfirm.com](mailto:kklein@rjfirm.com)

Steven G. Mintz, Esq.  
Terence W. McCormick, Esq.  
Scott Klein, Esq.  
Adam Brody, Esq.  
Alex Otchy, Esq.  
MINTZ & GOLD LLP  
600 Third Avenue  
25<sup>th</sup> Floor  
New York, NY 10016

Scarlett Singleton Nokes, Esq.  
Sheppard Mullin Richter & Hampton LLP  
2099 Pennsylvania Avenue, Nw Suite 100  
Washington, DC 20006  
Telephone: (202) 747-2309  
[snokes@sheppardmullin.com](mailto:snokes@sheppardmullin.com)

Gene R. Besen, Esq.  
Sheppard Mullin Richter & Hampton LLP  
2200 Ross Avenue, 20th Floor  
Dallas, Texas 75201  
Telephone (469) 391-7400  
Facsimile (469) 391-7401  
[gbesen@sheppardmullin.com](mailto:gbesen@sheppardmullin.com)

Thomas J. Hurney, Jr., Esq.  
Gretchen M. Callas, Esq.  
JACKSON KELLY PLLC  
500 Lee Street East, Suite 1600  
Post Office Box 553  
Charleston, West Virginia 25322  
Telephone: 304-340-1000  
[thurney@jacksonkelly.com](mailto:thurney@jacksonkelly.com)  
[gcallas@jacksonkelly.com](mailto:gcallas@jacksonkelly.com)

### *Counsel for the Executive Committee of the Southern Baptist Convention*

L. Gino Marchetti, Jr., Esq.  
TAYLOR, PIGUE, MARCHETTI & BLAIR,  
PLLC  
2908 Poston Avenue  
Nashville, TN 37203  
Telephone: (615) 320-3225  
[gmarchetti@tpmblaw.com](mailto:gmarchetti@tpmblaw.com)

Matthew C. Pietsch, Esq.  
GORDON REES SCULLY MANSUKHANI,  
LLP  
4031 Aspen Grove Drive, Suite 290

Telephone: (212) 696-4848  
[mintz@mintzandgold.com](mailto:mintz@mintzandgold.com)  
[mccormick@mintzandgold.com](mailto:mccormick@mintzandgold.com)  
[klein@mintzandgold.com](mailto:klein@mintzandgold.com)  
[brody@mintzandgold.com](mailto:brody@mintzandgold.com)  
[otchy@mintzandgold.com](mailto:otchy@mintzandgold.com)

*Counsel for Defendant*  
*Guidepost Solutions LLC*

Franklin, TN 37067  
Telephone: (615) 722-9000  
[mpietsch@grsm.com](mailto:mpietsch@grsm.com)

*Counsel for the Southern Baptist Convention*

Melissa J. Hogan, Esq.  
QAVAH LAW  
8757 Horton Hwy  
College Grove, TN 37046  
Telephone: (615) 293-6623  
[melissajhogan@qavahlaw.com](mailto:melissajhogan@qavahlaw.com)

*Counsel for Jane Doe*

s/ Robert D. MacGill  
Robert D. MacGill